

F. Gordon Maxson  
Director - Regulatory Affairs



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October 29, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Request for Confidential Treatment of Material Pertaining to  
GTE South Payphone Costs submitted by the  
North Carolina Payphone Association in CCB/CPD No. 99-27

Dear Ms. Salas:

GTE Service Corporation ("GTE") on behalf of GTE South Incorporated, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§0.457 and 0.459, respectfully requests that the GTE South cost material submitted by the North Carolina Payphone Association ("NCPA") not be made available for public inspection.

The cost data was submitted by NCPA under a request for confidentiality, but was not accompanied by a supporting request from GTE South. GTE South routinely files its cost support in North Carolina under state confidentiality rules, which may not be same as the Commission's Rules.

The pay telephone market is highly competitive and the information would be of commercial value to competitors. In this case, it is data related to the revenue, usage and costs of GTE South's access lines used by payphone providers. The disclosure of this information to the public would likely cause competitive injury to payphone providers which includes GTE's Public Communications group. See 5 U.S.C. §552(b)(4); National Parks and Conservation Ass'n v. Morton, 498 F.2d 765 (D.C. Cir. 1974); National Parks and Conservation Ass'n v. Kleppe, 547 F.2d 673 (D.C. Cir. 1976).

GTE South has no objection to making the information available to any party signing a nondisclosure agreement in order to have the opportunity to participate in the proceeding.

Accordingly, GTE respectfully requests that GTE South's material submitted by the NCPA be accorded confidential treatment under the Commission's Rules and not made available for inspection without a nondisclosure agreement.

A handwritten signature in cursive script, appearing to read "F. Gordon Maxson".

C: Lynne Milne, CPD